

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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AT 8:30 _____ M
WILLIAM T. WALSH
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ASTRAZENECA AB, AKTIEBOLAGET
HÄSSLE, ASTRAZENECA LP, KBI INC.
and KBI-E INC.,

Plaintiffs and
Counterclaim-Defendants,
v.

HANMI USA, INC., HANMI
PHARMACEUTICAL CO., LTD., HANMI
FINE CHEMICAL CO., LTD. and HANMI
HOLDINGS CO., LTD.,

Defendants and
Counterclaim-Plaintiffs.

Civil Action No. 3:11-CV-00760-JAP-TJB

Judge Joel A. Pisano
Magistrate Judge Tonianne J. Bongiovanni

STIPULATION AND ~~PROPOSED~~ ORDER REGARDING DEPOSITIONS

Plaintiffs AstraZeneca AB, Aktiebolaget Hässle, AstraZeneca LP, KBI Inc. and KBI-E Inc. (collectively, "AstraZeneca") and Defendants Hanmi, Inc., Hanmi Pharmaceutical Co., Ltd., Hanmi Fine Chemical Co., Ltd. and Hanmi Holdings Co., Ltd. (collectively, "Hanmi"), hereby stipulate and agree as follows:

1. Certain depositions, as identified below, were taken in the following prior actions brought by AstraZeneca against other defendants: *AstraZeneca, et al. v. Ranbaxy, et al.*, Civil Action No. 05-cv-5553-JAP-TJB; *AstraZeneca, et al. v. Dr. Reddy's Laboratories, et al.*, Civil Action No. 08-cv-0328-JAP-TJB; *AstraZeneca, et al. v. Teva, et al.*, 08-cv-2014-JAP-TJB.

2. The depositions taken in these prior actions include:

- Deposition of Sverker von Unge taken on September 23, 2008 in Civil Action Nos. 05-cv-5553, 08-cv-0328 and 08-cv-2014;
- Deposition of Sverker von Unge taken on September 24, 2008 in Civil Action Nos. 05-cv-5553, 08-cv-0328 and 08-cv-2014;

- Deposition of Sverker von Unge taken on September 24, 2008 in Civil Action Nos. 05-cv-5553, 08-cv-0328 and 08-cv-2014;
- Deposition of Sverker von Unge taken on September 25, 2008 in Civil Action Nos. 05-cv-5553, 08-cv-0328 and 08-cv-2014;
- Deposition of Sverker von Unge taken on May 19, 2009 in Civil Action No. 05-cv-5553;
- Deposition of Sverker von Unge taken on May 20, 2009 in Civil Action No. 05-cv-5553;
- Deposition of Sverker von Unge taken on May 21, 2009 in Civil Action No. 05-cv-5553;
- Deposition of Tommy Andersson taken on October 2, 2008 in Civil Action Nos. 05-cv-5553, 08-cv-0328 and 08-cv-2014;
- Deposition of Tommy Andersson taken on October 3, 2008 in Civil Action Nos. 05-cv-5553, 08-cv-0328, 08-cv-2014;
- Deposition of Tommy Andersson taken on October 3, 2008 in Civil Action Nos. 05-cv-5553, 08-cv-0328, 08-cv-2014;
- Deposition of Per Lindberg taken on October 21, 2008 in Civil Action Nos. 05-cv-5553, 08-cv-0328, 08-cv-2014;
- Deposition of Per Lindberg taken on October 22, 2008 in Civil Action Nos. 05-cv-5553, 08-cv-0328, 08-cv-2014;
- Deposition of Per Lindberg taken on October 22, 2008 in Civil Action Nos. 05-cv-5553, 08-cv-0328, 08-cv-2014;
- Deposition of Per Lindberg taken on October 23, 2008 in Civil Action Nos. 05-cv-5553, 08-cv-0328, 08-cv-2014;
- Deposition of Johann Senn Bilfinger taken on April 30, 2009 in Civil Action No. 05-cv-5553; and
- Deposition of Bernhard Kohl taken on May 7, 2009 in Civil Action No. 05-cv-5553.

3. AstraZeneca has produced to Hanmi in the present action transcripts of the depositions identified in paragraph 2 (“the Depositions”).

4. At any hearing or trial in the present action all or part of the Depositions may be used by any party in the present action against any other party in the present action to the extent they would be admissible under the Federal Rules of Evidence if the deponents were present and testifying.

Dated: July 19, 2012

s/John E. Flaherty

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So Ordered:

 7/23/12
Tonianne J. Bongiovanni
United States Magistrate Judge